

**NAVAL REACTORS DOE ORDER IMPLEMENTATION BULLETIN NUMBER
442.1A-83, REVISION 2**

Consistent with the NNPP overall concept of operations, the following provides specific implementation guidance for DOE Order 442.1A, DEPARTMENT OF ENERGY EMPLOYEE CONCERNS PROGRAM, for those activities under the Director's cognizance. The guidance takes precedence over DOE Order 442.1A series DEPARTMENT OF ENERGY EMPLOYEE CONCERNS PROGRAM and guidance found in other related DOE documents.

Paragraph 3.c of DOE Order 442.1A excludes activities of the Naval Reactors Program conducted under Executive Order 12344 from the Order's requirements.

Although this order is not applicable to the NNPP, it is Program practice to apply the provisions of DOE orders to the extent they are appropriate and consistent with Program practices. Accordingly, Program elements shall implement the requirements of DOE Order 442.1A subject to the following modifications:

a. In paragraph 4.b(7) the Environment, Safety and Health Program office shall mean "Naval Reactors Headquarters."

b. The function of paragraph 4.b(8) will be met by Naval Reactors Headquarters.

c. Due to the very small number of employee concerns which are raised within the Program and the close communications which exist between Naval Reactors Field Offices and Headquarters, the requirement to prepare and maintain a concerns log and quarterly and annual reports (paragraphs 4.d(1)(a), 4.d(1)(e), 4.d(2), and 5.c(9)) are unnecessary. Naval Reactors Field Elements should report any employee concerns to Headquarters as part of regular communications. Additionally, documented annual management assessments (paragraphs 4.d(1)(d) and 4.f) are unnecessary. Assessments of the employee concerns program will be included in periodic Naval Reactors Headquarters assessments of Program facilities.

d. In paragraph 4.c(1), item (f) is a necessary but not sufficient condition for designating an employee concern case to be closed.

e. Paragraph 4.d(4) is modified as follows: The Manager, Naval Reactors Laboratory Field Office (NRLFO) shall satisfy the responsibilities and requirements of the Employee Concerns

Program Manager and shall determine the retention period of Employee Concerns Program records in accordance with the General Records Schedule of the Government.

f. The duties and responsibilities delineated in paragraph 5.b are assigned to Manager, NRLFO.

g. Employee Concerns Program implementation documentation, as specified in paragraph 5.c(1), is not required because the very small number of employee concerns which are raised within the Program can easily be handled on an individual case basis.

h. The duties and responsibilities delineated in paragraph 5.d. are to be carried out by Naval Reactors Headquarters.

i. The Manager, NRLFO should ensure the provisions of DOE Order 442.1A, as modified by this Implementation Bulletin, are implemented in the prime contracts. Existing prime contractor procedures should be revised as necessary.

j. Paragraph 7.d: For the purpose of this Implementation Bulletin, "Employee Concern" should not be a minor employee grievance or suggestion that can be informally addressed, but rather should be interpreted as a formal concern submitted, orally or in writing, when, in the employee's judgment, attempts at resolution through the employee/management dialogue process have been or would be unsuccessful.

This DOE Order Implementation Bulletin should be attached to copies of the subject Order and transmitted to the contractors for whom the addressee is responsible.

Requests for waivers and exceptions to specific requirements of DOE Order 442.1A or this IB will be submitted to NR Headquarters for review and approval.

Oversight and evaluation of DEPARTMENT OF ENERGY EMPLOYEE CONCERNS PROGRAM matters under the Director's cognizance will be conducted by the Naval Reactor Laboratory Field Office with additional oversight provided by NR Headquarters.